

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

CITY OF DETROIT, MICHIGAN,

Debtor.

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Chapter 9

Case No. 13-53846

Hon. Steven W. Rhodes

**STATEMENT OF THE MICHIGAN COUNCIL 25 OF THE AMERICAN
FEDERATION OF STATE, COUNTY & MUNICIPAL EMPLOYEES,
AFL-CIO AND SUB-CHAPTER 98, CITY OF DETROIT RETIREES IN
AID OF THE COURT’S CONSIDERATION OF THE CITY OF
DETROIT’S MOTION TO STRIKE IN PART SYNCORA GUARANTEE
INC. AND SYNCORA CAPITAL ASSURANCE INC.’S SECOND
SUPPLEMENTAL OBJECTION TO THE DEBTOR’S PLAN OF
ADJUSTMENT**

The Michigan Council 25 of the American Federation of State, County & Municipal Employees, AFL-CIO and Sub-Chapter 98, City of Detroit Retirees (collectively, “**AFSCME**”), through its counsel, hereby files this statement (the “**Statement**”) in aid of the Court’s consideration of *The City Of Detroit’s Motion To Strike In Part Syncora Guarantee Inc. And Syncora Capital Assurance Inc.’s Second Supplemental Objection To The Debtor’s Plan Of Adjustment* [Docket No. 6845] and respectfully represents as follows:

1. The treatment provided in the current version of the Plan of Adjustment (the “**Plan**”), and particularly with respect to Classes 10, 11 and 12, was the result of difficult, lengthy, arms-length mediated negotiations between

AFSCME, the City and other active employee and retiree representatives. AFSCME participated in the mediation and found such mediation useful in reaching the agreements now embodied in the Plan, and the mediators played an important and critical role in the process.

Dated: August 21, 2014

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CERTIFICATE OF SERVICE

The undersigned certifies that on August 21, 2014, the foregoing document was filed with the Clerk of the Court using the CM/ECF system, which provides electronic notification of such filing to all counsel of record.

Dated: August 21, 2014

/s/ Philip J. Gross

Philip J. Gross

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